Options Discussion for Extinguishing Brown Tree Care Site Stump Dump Fire

Site History

Due to citizen's complaints received by Arkansas Department of Environmental Quality (ADEQ) and Arkansas Department of Health (ADH), during a phone call on September 19, 2018, the State of Arkansas requested EPA assistance in determining if any hazards were involved with an underground fire at the Brown Tree Care Site in Bella Vista, AR (Brown Tree Care Site). The site is the location of a stump dump where stumps, vegetation and possibly other materials have been dumped in the past.

The site is listed as 4.74 acres, Parcel number 16-77998-007, owned by Cletus and Karena Wilkins. The property is surrounded by residential properties to the north, east, south, and west amongst trees and rolling topography. A commercial storage facility, Blue Mountain Storage, is located directly south of the property. The approximate geographic coordinates are Latitude 36.461346° North and Longitude 94.209098° West. The site is located on the 8000 block Trafalgar Rd, Benton County, Arkansas. The site has limited access with unsecure and steep sides and subsidence issues. In addition, the cap is uncompacted and unstable.

EPA Activities

Starting around August 1, 2018, the State began receiving calls from citizens in the area regarding the odor and the smoke coming from the site. In mid-September, EPA was asked to sample the air at the site and the surrounding area.

EPA initially mobilized to the site on October 1, 2018 to collect 5 air samples for semi-volatile organic compounds (SVOCs) (i.e. naphthalene) and volatile organic compounds (VOCs) (i.e. benzene). One sample was collected on-site, three were collected in areas downwind of the site and an additional background sample was collected. The results for VOCs were all below their respective screening levels. The SVOC samples were unable to be analyzed due to sampling media issues.

Based on conversations with the State of Arkansas, EPA remobilized to the site on November 10, 2018 for a VOC and SVOC re-sampling effort. Due to a wind direction shift, different sites were sampled in addition to the on-site location. In addition to the community samples, EPA collected samples from 1 location within the Brown Tree Service property, and on November 10 found a Benzene concentration of 0.03 part-per-million (ppm).

Brief exposure (5-10 minutes) to very high levels of benzene in the air (10,000 - 20,000 ppm) can result in death, according to the Agency for Toxic Substances and Disease Registry. Lower levels (700 to 3,000 ppm) can cause drowsiness, dizziness, rapid heart rat, headaches, tremor, confusion and unconsciousness. In most cases, people will stop feeling these effects when they are no longer exposed and begin to breathe fresh air.

All SVOCs and VOCs were below their respective screening level except for benzene which was detected at the on-site location exceeding the non-cancer screening level. Off-site, benzene doesn't appear to present an unacceptable health risk. EPA presented these findings to the ADEQ and ADH.

Based on the previous sampling results, EPA mobilized to the site on December 10, 2018, for 3 days of sampling for VOCs and monitoring for particulate matter (PM). The final results for this round of sampling will be available December 21, 2018.

Options for extinguishing the underground fire at the Brown Tree Care Site

Technical experts from the Office of Research and Development (ORD) have provided the following preferred options to extinguish the underground fire quickly and with the lowest possible environmental and public health consequences.

Three Categories

- 1) Insertion of inert gas into Stump Dump
 - a. Description An injection of inert gas would choke off the oxygen that is being supplied to the fire and as a result the put out the fire.
 - b. Issues While this may work in theory, in practice it seems to be a challenge as the facility has stumps in it that create voids; as well as concrete and asphalt that are rather hard to drill. Municipal solid waste landfills are softer, so one can use a 32 inch auger and drill through the landfill. Here there are stumps, concrete, and asphalt therefore difficult to drill through those with a regular auger. Plus, there is a limited sphere of influence with an inert gas injection. The one location that we are aware of that used liquid nitrogen, worked for a short duration but the effectiveness went away after a while.
 - c. Overall Inert gas works in practice, but it is doubtful that at this site, the fire would be able to be controlled. The economics of putting a fire out of this size with an inert gas injection is something that has not been researched before and assumptions are it would be costly specifically with the drilling and getting the gas into the waste mass.

2) Chemical treatment

- a. Description The application of foams or chemicals to suppress or stop the fire.
- b. Issue There is an issue with using foams and chemicals in a watershed to a recreational lake. The fear would be that the behavior of these chemicals in this environment are unknown. The type of chemicals or foams are unknown, and the fear would be that those chemicals would make it into the waterways and then into the lake and cause another problem. In practice, the facility has stumps in it that create voids; as well as concrete and asphalt that are rather hard to drill. Municipal solid waste landfills are softer, so one can use a 32 inch auger and drill through the landfill. Here there are stumps, concrete, and asphalt therefore difficult to drill through those with a regular auger.
- c. Overall The unintended consequences of using these compounds may be an issue and in the long term this is not an effective way of putting out the fire.

3) Excavation and Douse with Water

- a. Description Excavation and dousing is possibly one way of going at putting the fire out at the site. While the perimeter of the site is inaccessible now, potentially putting a 20 to 25 feet fire break around the site would allow trucks and excavator and water trucks to go down there to excavate the site. The excavator would pull out the pieces of wood or other debris from the site and if there's a fire that erupted or flared the water truck could be used to put that fire out.
- b. Issues The positive of this approach is that it has been used at other landfill sites in Ohio. These are not tree stump sites but are municipal solid waste sites. The negative of such an approach is that the odor and smoke will get worse before they get better. The local citizenry would have to be contacted and made aware of such a move prior to making it so that they can take appropriate cautions. A temporary collection area would

- need to be constructed for waters used to control flames as well as water used to douse the waste.
- c. Overall Winter-time probably would be better to do this than summer because people are mainly indoors in winter and as a result there are less exposed to the smoke. It is a costly approach but it is an approach that has been utilized before successfully. One option for the waste after it is doused is replacement of the waste at the site in a manner engineered to ensure proper placement and prevent a future fire. The second is for the waste to be shipped offsite or destroyed on-site, when applicable.

Due to topography and the site structure, all of the above options will have difficulty with getting equipment on site and to the locations on the site where needed.